

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ULKU ROWE,

Plaintiff,

v.

Case No. 1:19-cv-08655-JHR

GOOGLE LLC,

Defendant.

DECLARATION OF CHRISTA TRINIDADE

COMES NOW CHRISTA TRINIDADE, and pursuant to 28 U.S.C. § 1746, declares as follows:

1. I am a citizen of the United States, over the age of 18, and competent to testify as to the matters contained in this Declaration.

2. I have personal knowledge of the facts set forth in this Declaration, or I have knowledge of such facts based upon information from business records of Google LLC (“Google”) in my custody and control.

3. I have worked in Google Cloud’s Office of the Chief Technology Officer (“OCTO”) since its inception in 2016. In 2017, I became a Program Manager in OCTO; since 2022, I have been a Senior Program Manager. I have been responsible for leading the strategy for OCTO programming since 2019. William Grannis is currently the Vice President and Chief Technology Officer of Google Cloud (*i.e.*, the “CTO” in “OCTO”).

4. OCTO holds a business-critical strategic planning conference twice annually (“OCTO Conference”). The purpose of the OCTO Conference is to gather the OCTO team spread across approximately 14 countries in a single location, in person, to align on strategic priorities and execution for the coming months. Members of OCTO actively participate in programming

aimed at identifying OCTO's strategic business objectives. Events will run from 8:00am to 10:00pm Pacific time each day. During the conference, members of OCTO also receive the skills training necessary to accomplish those objectives, align on Objectives and Key Results ("OKRs"), and showcase their unique in-development projects so that fellow team members can gain insights useful to their own work. Consistent with its business-criticality, OCTO designates almost 50% of its Travel & Expense budget to the OCTO Conference each year.

5. In March 2023, OCTO announced that the Fall 2023 OCTO Conference would be held from October 2 through 6, 2023, in Sunnyvale, California, and started planning the event. Attendance at the conference is mandatory for all members of OCTO.

6. In addition to OCTO members, key Google clients, stakeholders, and other strategic partners spanning both Google Cloud and Alphabet organizations (including members of Cloud and Alphabet's senior leadership team) attend the OCTO Conference. In total, Google expects up to 130 employees and strategic partners to attend, many of them flying into California from Africa, Europe, Asia, and South America for one of the few face-to-face opportunities members of this geographically-dispersed team enjoy each year.

7. Mr. Grannis was integrally involved in the planning for and execution of the event. In addition to developing the content for the OCTO Conference, Mr. Grannis will lead the agenda, guide the conversation about OCTO's business strategy throughout the complete schedule of programming from October 2 through 5, and meet with members of his team. On the final day of the event, Friday, October 6, Mr. Grannis will lead a closed-door strategic meeting with his direct leadership team, during which they will cover key developments for the year ahead, including the determination of both headcount and budget. None of these events can take place in Mr. Grannis' absence.

PURSUANT TO 28 U.S.C. § 1746, I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED STATES THAT THE FOREGOING IS TRUE AND CORRECT. I AM AWARE THAT IF ANY OF THE FOREGOING STATEMENTS MADE BY ME ARE FALSE, I AM SUBJECT TO PUNISHMENT.

Executed this 29th day of September, 2023 at San Francisco, California.

DocuSigned by:

Christa Trinitade

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CHRISTA TRINIDADE